

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

CHAPTER 13 CASE NO.:

ANTHONY ALEXANDER

20-12456-JDW

**RESPONSE TO MOTION FOR ABANDONMENT
AND RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY**

COMES NOW Locke D. Barkley, Chapter 13 Trustee, by and through counsel, and files this response to the Creditor, Bank of Holly Springs', Motion for Abandonment and Relief from Automatic Stay and Co-Debtor Stay (Dkt. #22) (the "Motion") and in support states as follows:

1. The Trustee has no opposition to the relief requested by Bank of Holly Springs (the "Bank") in the Motion.
2. According to the schedules and information available, the Trustee believes that there may be equity in some or all of the property which would be realized following the liquidation of the collateral. Any such equity would be nonexempt and should be paid to the Trustee.
3. The Trustee requests that any order granting the Motion include adequate provisions requiring the Bank to provide the Trustee with information regarding the liquidation of the collateral and the turnover of any proceeds remaining after satisfaction of the underlying claims.

WHEREFORE, PREMISES CONSIDERED, Locke D. Barkley, Chapter 13 Trustee, prays that upon notice and hearing that this Court enter its order granting the Bank's

Motion, subject to the limitations stated above, and for such other relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: September 17, 2020

Respectfully submitted,
LOCKE D. BARKLEY, TRUSTEE

BY: /s/ W. Jeffrey Collier
W. JEFFREY COLLIER, ESQ.
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CERTIFICATE OF SERVICE

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Bart M. Adams, Esq.
Attorney for Bank of Holly Springs
Notice via the CM/ECF system

Dated: September 17, 2020

/s/ W. Jeffrey Collier
W. JEFFREY COLLIER